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- Consultation Approach:**
- [Public consultation](#): **YES** (Expected Sep 2020)
 - [Targeted stakeholder consultation](#): **YES** (Stakeholder meeting on 5 Dec 2019, and informal through direct contact with Ministry)
- Timeline:**
- [Targeted stakeholder consultation](#): Stakeholder meeting on 5 Dec 2019
 - [Law proposal & public consultation](#): Expected around September 2020
 - [Adoption](#): 2021 Q1-Q2
- Relevant Contacts:**
- [Federal Ministry of Constitutional Affairs, Reforms, Deregulation and Justice – Departement I4, Intellectual Property and Anti-trust](#)
 - Mag. Christian Auinger, Director / Leitender Staatsanwalt
christian.auinger@bmvrj.gv.at – team.z@bmvrj.gv.at – T: (43 1) 52 152 2727
 - Mag. Vanessa Eriksson, Richterin des Landesgerichtes
team.z@bmvrj.gv.at – T: (43 1) 52 152 2727
 - Mag. Verena Strasser, Richterin des Bezirksgerichtes
team.z@bmvrj.gv.at – T: (43 1) 52 152 2727
- Process:**
- [October 2019](#): Ministry is actively looking for Austrian companies affected by Article 17 -> wants to have 1 on 1 exchanges with them
 - [Targeted stakeholder consultation](#): Stakeholder meeting on 5 Dec 2019 (see [invitation](#), incl. list of invited stakeholders)
- Additional Remarks:**
- [Article 15 \[Press Publishers' Right \(PPR\)\]](#):
 - Ministry indicated that whilst they might have some margin of manoeuvre on Article 17 (notably as regards safeguards), they are likely to be much more limited on Article 15.
 - Rainer Esser, CEO of media publishing group '[Zeit Verlag](#)' – publishing 'Die Zeit' in Germany and 'Zeit Österreich' in Austria – told Austrian newspaper Der Standard in an [interview](#) that [automated translation]:
"Google and Facebook bring us considerable traffic on our portals (...) Google was at the top with 30 percent and Facebook with six, seven percent. That's a little less now – but it's considerable. That's the case with all media, with some more, with others less. That's very gratifying after all. And everyone is making sure that Google finds them as well as possible. In return, I think it's a funny idea to ask Google for money to make them find you. The ancillary copyright law is important if someone taps off longer texts from us and uses them commercially. Then we have to have an ancillary copyright, not just the author's copyright, of course. But if someone takes snippets from us and helps us to be found on the net, then I can't charge him any money for them."
- Relevant Resources:**
- [Internal Resources](#)
 - [AT Justice Ministry Invitation 5 Dec 2019 DCDSM implementation](#)

stakeholder meeting

- External Resources
 - Members of Department 1.4 of the Ministry
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Belgium

[Dashboard](#) > [Wiki](#) > [Implementation Process](#) > [BE Implementation](#) >  Belgium

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- Consultation Approach:**
- Public consultation: **NO** (No consultation expected pre- or post-draft legislation)
 - Targeted stakeholder consultation: **YES** (Ongoing pre-draft legislation)
- Timeline:**
- General timeline: BE intends to present the draft legislation to the Parliament by end of 2020 / early 2021, with the goal of finalise its implementation by the 7 June 2021 transposition deadline.
 - Consultation process: BE aims to finalise its consultation process by the end 2019, and to have the results by early 2020.
- Relevant Contacts:**
- Federal Ministry of Economy (FOD/SPF Economie).
 - Mr Gunther Aelbrecht (Advisor)
gunther.aelbrecht@economie.fgov.be
 - Ms Natacha Lenaerts (Legal Counsel)
natacha.lenaerts@economie.fgov.be
 - Mr Tim Nagels (Jurist-Expert)
tim.nagels@economie.fgov.be
 - Ms Morgane Saint-Amand (Legal Attaché)
morgane.saint-amand@economie.fgov.be
- Process:**
- Stakeholder consultations in Intellectual Property Council:
 - 19 June, 2019 – Focus on Articles 1 to 14 [[read more below](#)]
 - 11 September, 2019 – Focus on Articles 15 & 17 [no details yet]
 - 5 November, 2019 (14h) – Focus on implementation proposals for Articles 2-7, 13-14 & 16
 - 21 November, 2019 (9h30)
 - 10 December, 2019 (14h)
- Additional Remarks:**
- Consultation process:
 - Timeline: BE aims to finalise consultation process by end 2019, and to have the results by early 2020.
 - Public consultation: No public consultation planned at this stage. It would be considered highly unusual for the Belgian government to launch one.
 - Targeted stakeholder consultation: Implementation relies solely on stakeholder dialogue process within the national consultative body: the Intellectual Property (IP) Council (Raad voor de Intellectuele Eigendom / Conseil de la Propriété Intellectuelle). The Government considers that all stakeholders groups are represented herein (rightsholders, business organizations [e.g. Agoria, tech sector], ISPs, producers, broadcasters, consumers, etc.).
 - Focus on specific categories of works: BE is carrying out 3 targeted consultations, each one focussing on a specific works category. In this context, external experts are invited to attend the IP Council's meetings.
- Relevant Resources:**
- Internal Resources
 - –

- External Resources
 - [Members of the Intellectual Property Council \[PDF\]](#)

READ MORE: FEEDBACK FROM 19 JUNE 2019 IP COUNCIL MEETING (ART. 1-14)

- Art. 1: Art. 1 of the DCDSM states that, except for the cases listed under Art. 24, it does not affect the existing legal instruments listed under Art. 1. However, Recital 4 states that the DCDSM 'complements' these legal instruments. BE seems to tend to stick to the interpretation of Art. 1.
- Art. 2 (Definitions): Concepts defined in DCDSM must be read as specific to this Directive (so not generally applicable to other areas). Definition of research organisations under DCDSM is broader than current scope under Belgian law as hospitals would fall under it (albeit only non profit ones).
- Art. 3 (Scientific TDM Exception):
 - Discussions on best practices are ongoing between cultural heritage institutions, research and rightholder organisations, under the supervision of the Minister.
 - Recital 14 implies that research organisations can use material that is available online, but does not specify if that material should have been placed legally online. Rightholders obviously consider that if material is illegally placed online, than it cannot be used for TDM. However, other experts highlighted that a manual check of the legality of online material contradicts the automated nature of TDM. This matter will be further examined.
 - Discrepancy between Art. 3 and Art. 4, as Art. 4 also covers exceptions stemming from the Software Directive, which Art. 3 does not.
 - The term 'legal access' is to be further specified.
- Art. 4 (Optional TDM Exception):
 - The use of works for TDM can be prohibited under Art. 4. This prohibition must be recognisable when using automated means. It should also be made clear in a machine readable manner if the mining occurs under Art. 3 or Art. 4.
 - No clarity on what is meant by machine readable (e.g. metadata?), and confusion as usually licences are the elements that need to be machine readable, not prohibitions. Moreover, Recital 18 mentions licences.
- Art. 5 (Education):
 - Discussions on remuneration for this exception: Idea to increase existing levies. The current levy is set by Royal Decree and is valid until 31 December 2023. The Ministry points out that the tariffs should be re-evaluated after the implementation of the DCDSM into national law by 2021. An economic study is suggested by the rightholders.
 - Discussions on the balance between granting exclusive rights/licences or a system based on exceptions: Unsurprisingly, rightholders favour licensing.
 - The Ministry considers that a blanket solution may not be appropriate, and that it may have to be considered on a case-by-case basis as in the past. During discussions relating to the reprography levies and the education exception, school book rightholders preferred not to work with licences as they considered it would create a disadvantage for smaller publishers.
 - According to the Ministry, interventions by 3rd-parties (for example in cases of digital or cross-border handlings) will be covered by this Article, as long as these interventions occur under the responsibility of the educational institution.
- Art. 6 (Cultural Heritage Preservation):
 - Extra condition compared to existing exception, namely that the work or other subject matter must be permanently part of the collection of the cultural heritage institution (CHI).
 - Problem: what does permanently mean, especially considering that many archives have items in loan for periods that extend to 30-40 years. Recital 29 is not considered enough to clarify the concept.
 - Scope of CHI seems not very open to interpretation, even though a sports organisation such as the International Olympic Committee (IOC) could fall under it if they can be considered as harbouring archives.
- Art. 7 (Common Provisions): Strange terminology used in French DCDSM translation: 'non exécutoire'.
- Art. 8 to 11 (Out-of-Commerce Works [OOCW]):
 - The Ministry considers that these provisions put in place an exception with an opt-out, except when there are enough representative collecting societies for a given type of work.
 - Recital 33 allows for 2 collecting societies to be appointed. Rightholders consider Auvibel or Reprobél as appropriate.
 - Discussion regarding the status of video games: The Ministry considers there is no representative collecting society covering them, so that they should benefit from the exception. One rightholder

representative considers they are represented by **SIMIM** and **BEA**, whilst another points out that BEA is not a collecting society as such (it's the Belgian Chapter of the International Federation of Music Producers), and would be in conflict of interest.

- The practical impossibility for each CHI to conclude licences with rightholders for OOCW is pointed out. CHIs prefer the use of the exception rather than a licence-based system, whilst rightholders claim that collecting societies are enablers in this process that offer a one-stop-shop.
- Discussion on OOCW definition: Art. 8(5) allows a Member State to define which works are out-of-commerce.
- The Ministry does not consider (as claimed by rightholders) that Art. 8(6) prohibits a Belgian CHI to conclude licences with a foreign collecting society.
- Art. 10: The Ministry considers the EUIPO portal to cover the publicity measures mentioned, whilst rightholders consider it as insufficient.
- What happens if a CHI receives a claim about an OOCW from a rightholder which is not a member of a collecting society when a licence has been concluded with the collecting society relevant to that type of work? The Ministry considers this situation to fall under the general rules of liability: if no opt-out was done, the rules related to collective licensing with an extended effect apply. If there is an opt-out, then a direct licence must be concluded between the rightholder and the CHI. Recital 36 specifies that Member States can specify who bears the legal responsibility as regards the licensing conclusion and ensuing obligations.
- Art. 12 (Extended Collective Licencing_[ECL]):
 - Such a system does not currently exist under Belgian law, and the question regarding the implementation of ECL into Belgian law remains open for now.
 - The Ministry proposes to look how this system works for OOCW, in order to assess if it's appropriate to implement it in Belgium.
 - Rightholders point out that the scope of ECL can be set by Royal Decree.
 - Difference between Articles 8 and 12: Art. 8 comprises a cross-border element, whilst Art. 12 doesn't.
- Art. 13 (Negotiation Mechanism regarding Video-on-Demand Platforms): Similarities with the cable provisions were pointed out. However, there is no clarity as regards the need to implement this provision specifically.
- Art. 14 (Public Domain): No need to implement this provision, as its principles are already in place in Belgian law, according to the Council's Chair. Experts consider it however a milestone that 'public domain' is referred to, and that the criteria of originality is specified.

Wiki

Bulgaria

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- Consultation Approach:**
- Public consultation: **TBC**
 - Targeted stakeholder consultation: **TBC**
- Timeline:**
- General timeline: Authorities have yet to gather information on the public's views on the directive and hold stakeholder meetings. The procedures are likely to start mid-2020.
- Relevant Contacts:**
- Ministry of Culture – Directorate Copyright and Neighbouring Rights
 - Mr Georgi Alexandrov Damyanov (Director Copyright and Neighbouring Rights Directorate)
g.damyanov@mc.government.bg
- Process:**
- **TBC**
- Additional Remarks:**
- –
- Relevant Resources:**
- Internal Resources
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 - External Resources
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Wiki

Croatia

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-
- Consultation Approach:**
- Public consultation: **TBC**
 - Targeted stakeholder consultation: **YES**
- Timeline:**
- General timeline: The State Intellectual Property Office (DZIV) is in charge of carrying out the Copyright Directive implementation in Croatia. So far, they have put together a working group of national experts, which will be responsible for adjusting the Directive to Croatian laws. The group is expected to meet for the first time by the end of 2019.
- Relevant Contacts:**
- State Intellectual Property Office (DZIV)
 - General contact address
kabinetravnatelja@dziv.hr
- Process:**
- **TBC**
- Additional Remarks:**
- –
- Relevant Resources:**
- Internal Resources
 - –
 - External Resources
 - A document detailing the process should be available on the State IP Office's [website](#)
 - Public consultations are often published [here](#).

Wiki

Cyprus

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- Consultation Approach:**
- Public consultation: **TBC**
 - Targeted stakeholder consultation: **TBC**
- Timeline:**
- **TBC**
- Relevant Contacts:**
- Ministry of Energy, Commerce and Industry_(MCIT)
 - General contact addresses
deptcomp@drcor.mcit.gov.cy
markspat@drcor.mcit.gov.cy
- Process:**
- **TBC**
- Additional Remarks:**
- –
- Relevant Resources:**
- Internal Resources
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 - External Resources
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-
- Consultation Approach:**
- Public consultation: **Not at present**
 - Targeted stakeholder consultation: **YES**
- Timeline:**
- **TBC**
- Relevant Contacts:**
- Ministry of Culture (MKCR)
 - Dr. Pavel Zeman (Director Copyright Law Department)
pavel.zeman@mkcr.cz
 - Dr. Adéla Faladová (Deputy Director Copyright Law Department)
adela.faladova@mkcr.cz – T + 420 257 085 322 – M + 420 606 627 408
- Process:**
- Targeted stakeholder consultation: The Czech Ministry of Culture has begun a stakeholder communication process, by which the Directive's text has been divided into 9 parts.
 - Stakeholders have been asked to tell which parts they want to propose amendments to.
 - A multiple choice questionnaire was sent to stakeholders.
- Additional Remarks:**
- Note: The Ministry does not seem very open to requests or input from non-Czech stakeholders.
 - Targeted stakeholder consultation: The Association of Library and Information Professionals of the Czech Republic (SKIP) has been able to register for consultations around Articles 3 to 12 through the website of the Ministry of Culture.
- Relevant Resources:**
- Internal Resources
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 - External Resources
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Denmark

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- Consultation Approach:**
- Public consultation: **YES** (Upcoming consultation post-draft legislation: expected in May/June 2020)
 - Targeted stakeholder consultation: **YES** (Ongoing pre-draft legislation: Oct 2019 till Feb 2020)
- Timeline:**
- General timeline: Legislative proposal to be put forward in October 2020.
 - Consultation timeline:
 - Stakeholder consultation: Stakeholder meetings and workshops from October 2019 until February 2020.
 - Public consultation: Expected in May/June 2020.
- Relevant Contacts:**
- Ministry of Culture
 - Mr Nicky Valbjørn Trebbien (Head of Copyright and Legal Unit)
ntv@kum.dk
 - Mr Jesper Diernisse Langsted (Specialist Consultant Legal/Copyright)
jdl@kum.dk
 - Ms Cæcilie Kjærside
ckj@kum.dk
 - Mr Kresten Lune Nielsen
kl@kum.dk
- Process:**
- Stakeholder consultation: Based on 'hearing list' of stakeholders
 - Workshops on:
 - Article 8-11 [Out-of-Commerce Works (OOCW)]
 - Article 12 [Extended Collective Licensing (ECL)]
 - Article 17 [Upload Filtering] (14 Nov 2019 – 2.5hrs)
 - Article 18-22 [Fair Remuneration]
 - Smaller-scale stakeholder meetings on:
 - Articles 3-4 [Text and data mining (TDM)]
 - Article 5 [Education]
 - Article 6 [Cultural Heritage Preservation]
 - Article 15 [Press Publishers' Right (PPR)]
 - Article 16 [Claims to Fair Compensation]
 - Written input/bilateral contacts on:
 - Article 13 [VOD Negotiation Mechanism]
 - Article 14 [Works of Visual Art in the Public Domain]
 - Public consultation: To be announced on DK '[hearing portal](#)'
- Additional Remarks:**
- Consultation process:
 - Workshops: Open for participation to interested stakeholders.

- Smaller-scale stakeholder meetings: Appear to be 'invitation-only'.
- Article 15 [PPR]: Subject appears to have been pushed to a smaller-scale stakeholder meeting based on the fact that the Culture Ministry considers that the provision contains a lot of unclear elements and due to the fact that they face resource constraints.
- Article 17 [Upload filtering]: IT-Pol Denmark (EDRi member) registered for the workshop, but awaits confirmation of participation.

Relevant Resources:

- Internal Resources
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- External Resources
 - DK 'hearing portal'

Estonia

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- Consultation Approach:**
- Public consultation: **TBC**
 - Targeted stakeholder consultation: **TBC**
- Timeline:**
- **TBC**
- Relevant Contacts:**
- Ministry of Justice
 - Ms Gea Lepik (Director Intellectual Property and Competition Law Division)
gea.lepik@just.ee
- Process:**
- **TBC**
- Additional Remarks:**
- –
- Relevant Resources:**
- Internal Resources
 - –
 - External Resources
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+ Finland

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- Consultation Approach:**
- Public consultation: **NO** (Upcoming consultation post-draft legislation: expected for Summer/Autumn 2020)
 - Targeted stakeholder consultation: **YES** (Ongoing pre-draft legislation: Workshops)
- Timeline:**
- General timeline: The Ministry of Education and Culture aims to publish a bill for consultation in Summer/Autumn 2020. An amended bill will be sent to parliament in Autumn/Winter 2020 or early 2021 at the latest (depending on how substantial the amendments will be).
- Relevant Contacts:**
- Ministry of Education and Culture
 - Ms Viveca Still (Copyright Counsellor)
viveca.still@minedu.fi
- Process:**
- Workshops: A variety of workshops have been held. Presentations can be found on the Ministry's dedicated [implementation process webpage](#):
 - 16/05/2019 – Workshop on teaching uses (Article 5)
 - 17/05/2019 – Workshop on TDM (Articles 3-4)
 - 23/05/2019 – Workshop on platform liability (Article 17)
 - 29/05/2019 – Workshop on press publishers' right (Article 15)
 - 14/06/2019 – Workshop on protection of authors and performers (Articles 18-22)
 - 17/06/2019 – Workshop on access to cultural heritage, OOCW & ECL
 - 26/09/2019 – Workshop on the development of a contractual licensing system
 - 21/10/2019 – Workshop on implementation of platform liability (Article 17)
 - 15/11/2019 – Workshop on press publishers' right (Article 15)
- Additional Remarks:**
- –
- Relevant Resources:**
- Internal Resources
 - –
 - External Resources
 - Ministry's [dedicated webpage](#) on the implementation process
 - Article 17 FI Ministry presentation (16/10/2019) [[PPT](#)]
 - Article 17 workshop (21/10/2019) – participants list [[PDF](#)]

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- Consultation Approach:**
- Public consultation: **NO**
 - Targeted stakeholder consultation: **NO**
- Timeline:**
- [Article 15](#) [Press Publishers' Right (PPR)]: Legislation adopted in 2nd reading on 23 July; enacted on 24 July; and published on 26 July, 2019. **The French PPR entered into force on 24 October 2019.**
 - [Article 17](#) [Upload Filtering] & [Articles 18-22](#) [Creators' Rights]: Art. 17, along with Articles 18 to 22, will be transposed as part of the French audiovisual reform, which implements the Audiovisual Media Services Directive (AVMSD). Current timetable:
 - *End September 2019*: Submission to Council of State, CSA (audiovisual regulator), HADOPI (anti-piracy body) and ARCEP (telecoms regulator) for their opinions
 - *Mid-November 2019*: Presentation to Council of Ministers
 - *End of Jan 2020*: Proposal expected in the National Assembly for debate
 - Other provisions: Timeline unclear
- Relevant Contacts:**
- Ministry of Culture and Francophone Affairs
 - Ms Anne Le Morvan (Head of the Literary and Artistic Property Office)
anne.le-morvan@culture.gouv.fr
- Process:**
- [Article 17](#) [Upload Filtering] & [Articles 18-22](#) [Creators' Rights]: Waiting for the French audiovisual reform to reach the National Assembly and Senate => Expected in the National Assembly by end of Jan 2020.
- Additional Remarks:**
- [Article 17](#) [Upload Filtering] – Protection of exceptions: France's initial proposals were quite weak on ensuring the protection of exceptions under Article 17, as they replaced the prohibition to remove the safeguards allowing users to rely on specific exceptions (cf. Art. 17(7)), with a mere obligation for online services to inform users about these specific exceptions in their terms and conditions, which almost no one tends to read. In the meantime, the European Commission clarified in reply to a [Parliamentary Question](#) from the European Parliament that: "(...) the Commission considers that the obligations provided for in paragraphs 7 and 9 cannot be considered fulfilled by Member States by seeking to rely on any general provision informing users about existing exceptions and limitations in the terms of use of the OCSSPs." (see [full reply](#))
- Relevant Resources:**
- Internal Resources
 - –
 - External Resources
 - [Legislative Proposal](#) (see Chapter IV) [DOC] ([Explanatory Memorandum](#) [DOC]) [08 Oct 2019]
 - [HADOPI Opinion](#) [24 Oct 2019]
 - [NextInpact – Art. 13/17 Scheme](#) [13 March 2019]
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- Status:**
- Implementation status: France transposed the press publishers' right ([Article 15](#)) of the DCDSM through a standalone legislative proposal into national law. This legislation adopted in 2nd reading on 23 July; enacted on 24 July; and published on 26 July, 2019. **The French PPR entered into force on 24 October 2019.**
 - Application status – Google: Ahead of the entry into force, Google **announced** it would change how articles appear in their search results, to avoid having to sign licensing agreements.

This provoked a lot of outrage and criticism from policymakers and copyright maximalist press publishers. The political pressure has led to the French competition authority ([ADLC](#)) to already launch an exploratory investigation into Google's approach. According to Contexte the members of the French Alliance of General Information Press (APIG) are preparing the submission of a formal complaint to the ADLC. News agency Agence France-Presse (AFP), who is not part of APIG is apparently preparing a separate complaint. APIG is also exploring the option of pushing legislators to adopt an amendment to the audiovisual reform (see above) that would enable the creation of a dispute resolution committee to mediate between press publishers and platforms.

On 21 October, [research by mind Media](#) showed that around 24% of the French news websites studied by them (= 1053 sites) already decided to comply with Google's new terms and conditions. More details below.

- Application status – Facebook: Press publishers had set their hopes on Facebook and their "News Tab", as they expected FB to license the content being displayed. However, their tone quickly changed when it became clear that FB is not licensing the content either, and they also accused FB of abusing of its dominant position. ([source](#))

However, according to POLITICO French Junior Digital Minister Cédric O came to FB's 'rescue', as he pushed back against the press publishers claims, and raised the question: "Facebook as such does fall under the scope of the neighboring right. The question is whether we can consider that sharing a press article on your news feed... falls under the neighboring right. That does raise a legal question". "In their news tab, [Facebook] decided to reference some quality media and to provide remuneration, which is closer to the spirit of the directive on neighboring rights," said Cédric O, adding that the news tab raised other types of questions such as the social media giant's potential role as "censor." (see [FB's statement](#) from 24 Oct 2019 – France Inter's [interview](#) with Cédric O)

Legislative Instrument: 'LOI n° 2019-775 du 24 juillet 2019 tendant à créer un droit voisin au profit des agences de presse et des éditeurs de presse'

- Official Resources:**
- [Adopted legislation](#)
 - [National Assembly – Legislative File](#)
 - [Senate – Legislative File](#)

- Further Reading:**
- AFP – [French media take Google to competition regulator over copyright](#) [24 Oct, 2019]
 - Richard Gingras (Vice President News @ Google) – [Toward a Healthy and Sustainable Future for Journalism](#) [10 Oct, 2019]
 - Thomas Baekdal (Media Analyst) – [Twitter thread on the Google vs. publishers debate](#) [28 Sept, 2019]
 - Digiday – ['It's blackmail': French and German publishers unite to fight Google's refusal to pay them copyright fees](#) [27 Sept, 2019]
 - Techdirt – [Just As Everyone Predicted: EU Copyright Directive's Link Tax Won't Lead To Google Paying Publishers](#) [27 Sept, 2019]

GOOGLE'S DECISION TO CHANGE HOW IT DISPLAYS NEWS ARTICLES: ACTIONS & REACTIONS TO THIS DECISIONS

ACTIONS

- Competition approach: Under political pressure the French competition authority (ADLC) already launched an exploratory investigation into Google's approach. According to Contexte the members of the French Alliance of General Information Press (APIG) are preparing the submission of a formal complaint to the ADLC. News agency Agence France-Presse (AFP), who is not part of APIG is apparently preparing a separate complaint. French President Macron also called upon the EC to also look into the matter from the competition angle, however current and incoming Competition Commissioner Margrethe Vestager indicated that she considers this to be more a copyright than competition matter currently. Former MEP Julia Reda (Greens/EFA – Pirate Party, DE) recalled that the German press publishers already unsuccessfully tried this approach to resolve their dispute with Google in the context of the German national press publishers' right. The German competition authority (Bundeskartellamt) found in its 2015 decision that (see English summary): "It is highly probable that neither the opt-in declaration required by Google nor the alternative curtailed presentation of search results by omitting snippets and preview images fulfils the requirements of discrimination and unfair hindrance, even if it is assumed that Google has a dominant position."
- Legislative approach: APIG is also exploring the option of pushing legislators to adopt an amendment to the audiovisual reform (see above) that would enable the creation of a dispute resolution committee to mediate between press publishers and platforms.

REACTIONS

- Google's Position: A Google spokesperson stated to POLITICO that: "Publishers have more choice than ever before over how their content appears on Google. Regardless of the choice they make, we're not removing anyone from search and we're not changing how we assess the relevance of a page. The law does not mandate payment for links, and European publishers already derive significant value from the 8 billion visits they get every month from people searching on Google. And of course, we're happy to answer any questions the competition authority may have". (see also this [blog post](#) from Richard Gingras, Vice President News @ Google)
- Reactions from Legislators to Google's Decision
 - **FR | Franck Riester, Minister of Culture**: "Google's statements on the issue of compensation are not admissible. The political objective pursued by the creation of the neighbouring right, and its translation into law, are obvious: to allow a fair sharing of the value produced, for the benefit of platforms, by press content. From this point of view, Google's proposal is not acceptable (...)". Minister Riester added: "I call for a genuine global negotiation between Google and the publishers: the unilateral definition of the rules of the game is contrary both to the spirit of the directive and to its text. I will be meeting with my European counterparts to address this situation very soon." ([statement](#))
 - **FR | Cédric O, Minister of State for Digital**: "Google's decision of is not only regrettable, but it is also disrespectful of the spirit of the European directive and French law." ([tweet](#))
 - **FR | Patrick Mignola, PPR Rapporteur in French National Assembly**: MP Mignola noted they will not give in to Google's intimidations, and reminded them that "democracy is respect for the law and not by-passing it, and that elected officials, like other Internet users, cannot be compelled to live under the sole law of the strongest one". He added that "if Google persists in getting drunk on its power, national representation will stand before them to defend the press and the rule of law". ([statement](#) – [tweet](#))
 - **FR | David Assouline, PPR Rapporteur in French Senate**: "Google should show more respect for France by applying the law (of which I am the author) instead of bypassing it. This giant must pay the tiny share of its colossal revenues to finance the professional production of information." ([tweet](#))
MP Assouline added that: "Google news used the very short texts made by journalists and produced by news agencies or publishers without paying them and captured the advertising accordingly. They claim they don't need it. We will see the outcome of the balance of power that has only just begun..." ([tweet](#) – see also the [Joint Statement](#) by the National Assembly and Senate)
 - **EC | European Commission (EC)**: A spokesperson of the EC told POLITICO that: "The [copyright] directive is not in danger. On the contrary it makes EU copyright rules fit for today's digital world and will make it much easier for creators and right holders, press editors and journalists to be remunerated for the online use of their content. The new right granted to press publishers will give them the possibility to authorize and prohibit online uses of their press publications by platforms. We are at the disposal to the French government to support the transposition of the directive." To EurActiv the EC also clarified that: "During the legislative negotiations, the co-legislators explicitly excluded uses of individual words and very short extracts of press publications. This means that they can be used without any authorisation and for free."

- **EP | MEP Axel Voss, DCDSM Rapporteur:** MEP Voss (EPP, DE) received the 2019 award of the Association for the Development of Intellectual Property (ADEPI) in Madrid last week, and [spoke with EuroEFE](#) at this occasion. On the question if Google “work[s] as a ‘digital dictatorship’, with a monopoly intention”, Voss replied: “Yes, they are using their economic power to take everything in their path out of their way. We cannot accept that our press and our press services can be affected in such a way that they no longer receive money because everything appears on the Internet. **Even if they close the news aggregator, they would also be opening a kind of window of opportunity for all European publishers to create something similar themselves**, with even more attractive platforms (than Google, for example). Perhaps, in the end, it will be an advantage.”
- Reactions from Copyright Maximalist Stakeholders to Google’s Decision
 - **FR | Eric Léandri, CEO of Qwant (a French Google ‘alternative’, in which Axel Springer invested):** EurActiv [reports](#) that Léandri foresees a similar agreement to the one concluded in Germany with VG Media, the German newspaper publishers’ association, where 5% of the audience-generated revenues is transferred.
 - **FR | Pierre Louette, CEO of Les Echos (owned by luxury firm LVMH):** “This is just the beginning of phase two. Classic reaction from whoever wants to propose a fool’s bargain by abusing a dominant position. We can’t have the choice between appearing or disappearing: The fight continues!” ([tweet](#))
 - **EU | ENPA & EMMA:** The European Newspaper Publishers’ Association (ENPA) and European Magazine Media Association (EMMA) issued a joint statement to condemn Google’s announcement on this matter, as they believe that “Google is using its market power to endanger journalism”. In their view, Google’s decision “goes against the intentions of the European and the French legislators and represents a clear defiance of the European press sector”, and they add that “this decision will have repercussions all over Europe and the French case is the continuation of the combat of European publishers”. ([statement](#))
 - **FR – DE | Alliance de la presse d’information générale (APIG) & Bundesverband Deutscher Zeitungsverleger (BDZV):** The French Alliance of General Information Press and the Federal Association of German Newspaper Publishers jointly call for a swift and uniform implementation of the press publishers’ right across the EU. ([statement](#) – see the French-German [Toulouse declaration](#))
 - **Global | +900 journalist & international personalities:** A group of more 900 journalists, together with international personalities, published an [op-ed](#) on 24 October 2019 in the French newspaper Le Monde to criticise Google’s attitude and refusal to pay press publishers.
- Reactions from Progressive Stakeholders to Google’s Decision
 - **FR | SPILL:** The French union of the independent online information press, representing the more progressive online press publishers, issued a statement explaining that in their view: neighbouring rights “are a bad solution to a real problem”. According to them this approach is flawed on multiple levels: at the legal, practical, economical, democratic and strategic level. Instead, they call for “genuine democratic regulation of online press distribution”. Spill considers that a fundamental change is needed, as their “sector must unlearn how to use its political power to create rents guaranteed by legislation”. Spill also told POLITICO that the neighbouring right “will lead to favoring buzz over quality and thorough reporting”.

Germany

[Dashboard](#) > [Wiki](#) > [Implementation Process](#) > [DE Implementation](#) >  Germany

-
- Consultation Approach:**
- Public consultation: **YES (Closed 6 Sept 2019)**
 - Targeted stakeholder consultation: **TBC**
- Timeline:**
- **TBC**
- Relevant Contacts:**
- Federal Ministry of Justice and Consumer Protection (BMJV)
 - Mr Matthias Schmid (Head of Unit Copyright and Publishing Law)
referat-III3@bmjv.bund.de
- Process:**
- Public Consultation: The Federal Ministry of Justice and Consumer Protection (BMJV) organised a consultation from 4 July 2019 until 6 September 2019 on the implementation of the two copyright Directives (EU) 2019/790 (DSM Directive) and (EU) 2019/789 (Online SatCab Directive) of 17 April 2019.
 - General: The BMJV is evaluating comments received during the public consultation and are keeping an eye on other Member States' implementation efforts.
- Additional Remarks:**
- Public Consultation: The consultation did not ask any specific questions, but allowed stakeholders to broadly comment on the different provisions of the DCDSM. The BMJV also encouraged stakeholders to propose concrete regulatory texts for the transposition into German law.
- Relevant Resources:**
- Internal Resources
 - July, 2019 consultation – responses C4C network:
 - [Initiative gegen ein Leistungsschutzrecht](#)
 - [Digitale Gesellschaft e.V.](#)
 - [Bundesverband Deutsche Startups](#)
 - [Freischreiber – Berufsverband freier Journalistinnen und Journalisten](#)
 - [Deutscher Bibliotheksverband e.V.](#)
 - [Verbraucherzentrale Bundesverband e.V.](#)
 - External Resources
 - [DE Article 17 Council statement](#)
 - [July, 2019 consultation: text](#)
 - [July, 2019 consultation: responses](#)

Wiki

Greece

[Dashboard](#) > [Wiki](#) > [Implementation Process](#) > [GR Implementation](#) >  Greece

- Consultation Approach:**
- Public consultation: **TBC**
 - Targeted stakeholder consultation: **TBC**
- Timeline:**
- General timeline:
 - The Greek Ministry of Culture assembled a legislative committee to prepare a draft law on the implementation of the copyright Directive with a deadline at the end of June 2020.
 - In June 2020, the political decision will be made if and when the government will go forward with the bill and the exact provisions it will enact, meaning that it could take a lot more time to table the bill to Parliament.
- Relevant Contacts:**
- Ministry of Culture – Hellenic Copyright Organization (OPI)
 - Ms Evangelia Vagena (Director OPI)
director@opi.gr
- Process:**
- **TBC**
- Additional Remarks:**
- –
- Relevant Resources:**
- Internal Resources
 - –
 - External Resources
 - –

Hungary

[Dashboard](#) > [Wiki](#) > [Implementation Process](#) > [HU Implementation](#) >  Hungary

- Consultation Approach:**
- [Public consultation](#): **TBC**
 - [Targeted stakeholder consultation](#): **TBC**

- Timeline:**
- **TBC**

- Relevant Contacts:**
- [Hungarian Intellectual Property Office \(HIPO\)](#)
 - Mr Péter Lábody (Head of Copyright Department)
peter.labody@hipo.gov.hu
 - Mr Dénes Legeza (Deputy Head of Copyright Department)
denes.legeza@hipo.gov.hu

- Process:**
- **TBC**

- Additional Remarks:**
- –

- Relevant Resources:**
- [Internal Resources](#)
 - –
 - [External Resources](#)
 - –

Wiki

Iceland

[Dashboard](#) > [Wiki](#) > [Implementation Process](#) > [IS Implementation](#) >  [Iceland](#)

-
- Consultation Approach:**
- [Public consultation](#): **TBC**
 - [Targeted stakeholder consultation](#): **TBC**
- Timeline:**
- **TBC**
- Relevant Contacts:**
- [Ministry of Education, Science and Culture](#)
 - Mr Jón Vilberg Guðjónsson (Director Department of Legal Affairs and Public Administration)
jon.vilberg.gudjonsson@mrn.is
- Process:**
- **TBC**
- Additional Remarks:**
- –
- Relevant Resources:**
- [Internal Resources](#)
 - –
 - [External Resources](#)
 - –

Ireland

[Dashboard](#) > [Wiki](#) > [Implementation Process](#) > [IE Implementation](#) >  Ireland

-
- Consultation Approach:**
- Public consultation: **YES**
 - Targeted stakeholder consultation: **TBC**
- Timeline:**
- Public consultation: The copyright section's intention is to finalise all consultations by the end of 2019: therefore, the consultation periods for the different topics may overlap slightly. All consultations should be open for a 4-week period.
- Relevant Contacts:**
- Department of Business, Enterprise and Innovation (DBEI) – Intellectual Property (IP) Unit, Copyright Section
 - Ms Patricia Mollaghan
patricia.mollaghan@dbei.gov.ie – T +353 (0)56 7720152
 - Ms Laura Egerton
laura.egerton@dbei.gov.ie
 - General contact address
copyright@dbei.gov.ie
- Process:**
- Public consultation:
 - The copyright section is consulting in 4 phases on the various provisions of the copyright Directive. Consultations topics are:
 - **Article 13 to 17** (deadline: 23 Oct 2019);
 - **Articles 2-7** – Exceptions and limitations (deadline: 14 Nov 2019);
 - **Articles 8-12** – Out-of-commerce works and extended collective licensing (deadline: 4 Dec 2019); and,
 - **Articles 18-23** – Fair remuneration (deadline: TBC).
- Additional Remarks:**
- DBEI mailinglist: The DBEI's copyright section operates a copyright mailinglist: reach out to copyright@dbei.gov.ie to request to be included.
 - Article 17 [Upload filtering]: The Irish implementation of Article 17 could be of specific importance if one considers that the scope of the national transposition is that of an OCSSP in a given Member State.
- Relevant Resources:**
- Internal Resources
 - C4C's **response** to consultation paper No 1 on Articles 13 to 17
 - External Resources
 - **Consultation paper No. 1** (Articles 13-17) (deadline: 23 Oct 2019)
 - **Consultation paper No. 2** (Articles 2-7) (deadline: 14 Nov 2019)
 - **Consultation paper No. 3** (Articles 8-12) (deadline: 4 Dec 2019)

Wiki

Italy

[Dashboard](#) > [Wiki](#) > [Implementation Process](#) > [IT Implementation](#) >  Italy

- Consultation Approach:**
- Public consultation: **TBC**
 - Targeted stakeholder consultation: **TBC**
- Timeline:**
- General timeline: Two phased approach:
 1. Law of delegation: to be approved by Parliament in Spring 2020, with indication of general criteria; and,
 2. Detailed transposition by Government.
- Relevant Contacts:**
- Ministry for Cultural Heritage and Activities and for Tourism
 - General Directorate for Libraries and Cultural Institutes – Service II
dg-bic.servizio2@beniculturali.it
- Process:**
- **TBC**
- Additional Remarks:**
- –
- Relevant Resources:**
- Internal Resources
 - –
 - External Resources
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Wiki

Latvia

[Dashboard](#) > [Wiki](#) > [Implementation Process](#) > [LV Implementation](#) >  Latvia

- Consultation Approach:**
- [Public consultation](#): **TBC**
 - [Targeted stakeholder consultation](#): **TBC**

- Timeline:**
- **TBC**

- Relevant Contacts:**
- [Ministry of Culture \(KM\)](#)
 - Ms Linda Zommere (Head of Copyright Division)
linda.zommere@km.gov.lv
 - Mr Jurgis Īvāns (Senior Legal Advisor of Copyright Division)
jurigs.ivans@km.gov.lv

- Process:**
- **TBC**

- Additional Remarks:**
- –

- Relevant Resources:**
- [Internal Resources](#)
 - –
 - [External Resources](#)
 - –

Liechtenstein

[Dashboard](#) > [Wiki](#) > [Implementation Process](#) > [LI Implementation](#) >  Liechtenstein

-
- Consultation Approach:**
- Public consultation: **TBC**
 - Targeted stakeholder consultation: **TBC**
- Timeline:**
- **TBC**
- Relevant Contacts:**
- Office for Economic Affairs (AVW) – Bureau of Intellectual Property
 - Mr Ute Hammermann (Head of Legal Division)
ute.hammermann@avw.llv.li
- Process:**
- **TBC**
- Additional Remarks:**
- –
- Relevant Resources:**
- Internal Resources
 - –
 - External Resources
 - –

Wiki

Lithuania

[Dashboard](#) > [Wiki](#) > [Implementation Process](#) > [LT Implementation](#) >  Lithuania

-
- Consultation Approach:**
- Public consultation: **TBC**
 - Targeted stakeholder consultation: **TBC**
- Timeline:**
- **TBC**
- Relevant Contacts:**
- Ministry of Culture – Copyright Division (LRKM)
 - Mr Deividas Velkas
deividas.velkas@lrkm.lt
- Process:**
- **TBC**
- Additional Remarks:**
- –
- Relevant Resources:**
- Internal Resources
 - –
 - External Resources
 - –

Luxembourg

[Dashboard](#) > [Wiki](#) > [Implementation Process](#) > [LU Implementation](#) >  Luxembourg

-
- Consultation Approach:**
- Public consultation: **TBC**
 - Targeted stakeholder consultation: **YES** (Upcoming: Appears to be limited to public sector stakeholders)
- Timeline:**
- General timeline: Hope to introduce draft law into legislative process at the latest during 1st semester of 2021.
- Relevant Contacts:**
- Ministry of Economy – Intellectual Property Office
 - Mr Lex Kaufhold (Director)
lex.kaufhold@eco.etat.lu
 - Ms Iris Depoulain (Copyright and Neighbouring Rights)
iris.depoulain@eco.etat.lu
- Process:**
- **TBC**
- Additional Remarks:**
- Targeted stakeholder consultation: Indicate that they also remain at the disposal of interested private sector parties to discuss the implementation.
- Relevant Resources:**
- Internal Resources
 - –
 - External Resources
 - –

Wiki

Malta

[Dashboard](#) > [Wiki](#) > [Implementation Process](#) > [MT Implementation](#) >  Malta

-
- Consultation Approach:**
- Public consultation: **NO**
 - Targeted stakeholder consultation: **YES** (Envisaged for April 2020)
- Timeline:**
- Targeted stakeholder consultation: Envisaged for April 2020.
- Relevant Contacts:**
- Commerce Department
 - Mr Matthew Pisani (Director Industrial Property Reg.)
matthew.pisani@gov.mt
- Process:**
- **TBC**
- Additional Remarks:**
- –
- Relevant Resources:**
- Internal Resources
 - –
 - External Resources
 - –

Netherlands

[Dashboard](#) > [Wiki](#) > [Implementation Process](#) > [NL Implementation](#) >  Netherlands

-
- Consultation Approach:**
- Public consultation: **YES**
 - Targeted stakeholder consultation: **TBC**
- Timeline:**
- General timeline: **TBC**
 - Public consultation: Closed on 2 Sept 2019
- Relevant Contacts:**
- Ministry of Justice and Security (Ministerie JenV)
 - Mr Cyril van der Net (Legal Counsel)
c.b.van.der.net@minvenj.nl
- Process:**
- Legislative proposal: The Dutch Government published its **implementation proposal** (**explanatory note**) on 2 July 2019.
 - Public consultation: The Dutch Government also issued a **consultation** on 2 July 2019 on its implementation proposal, which limited itself to one basic question: “Does the proposed implementation law transpose the Directive fully and correctly?” (“Wordt met het implementatiewetsvoorstel de richtlijn volledig en juist omgezet?”). The consultation closed on 2 September 2019. Responses can be found [here](#).
- Additional Remarks:**
- –
- Relevant Resources:**
- Internal Resources
 - COMMUNIA's **blog** on how Netherlands leads the way with its proposed implementation of the new educational exception
 - Consultation responses
 - **Bits of Freedom**
 - **Vrijschrift**
 - **Other responses**
 - External Resources
 - **Implementation proposal** (in Dutch)
 - **Explanatory note** (in Dutch)

Wiki

Norway

[Dashboard](#) > [Wiki](#) > [Implementation Process](#) > [NO Implementation](#) >  Norway

-
- Consultation Approach:**
- Public consultation: **TBC**
 - Targeted stakeholder consultation: **TBC**
- Timeline:**
- General timeline: Norway has not reached the implementation stage yet, but is closely following the EU implementation process.
- Relevant Contacts:**
- Norwegian Ministry of Cultural Affairs
 - Ms Christine Hamnen (Director General Department of Media and the Arts)
christine.hamnen@kud.dep.no
 - Mr Torbjørn Backer Hjorthaug (Deputy Director General Department of Media and the Arts)
torbjorn-backer.hjorthaug@kud.dep.no
- Process:**
- **TBC**
- Additional Remarks:**
- –
- Relevant Resources:**
- Internal Resources
 - –
 - External Resources
 - –

Wiki

Poland

[Dashboard](#) > [Wiki](#) > [Implementation Process](#) > [PL Implementation](#) >  Poland

-
- Consultation Approach:**
- [Public consultation](#): **TBC**
 - [Targeted stakeholder consultation](#): **TBC**
- Timeline:**
- **TBC**
- Relevant Contacts:**
- [Ministry of Culture and National Heritage \(MKIDN\)](#)
 - Ms Katarzyna Falkowska-Gołębiewska (Director Department of Intellectual Property and Media)
dwim@mkidn.gov.pl
- Process:**
- **TBC**
- Additional Remarks:**
- [CJEU legal challenge against Article 17 \[Upload Filtering\]](#): In May 2019, the Polish Government [Law and Justice party (PiS)] launched an action for annulment before the Court of Justice of the European Union (CJEU) regarding [Article 17 \[C-401/19\]](#). More details [here](#).
- Relevant Resources:**
- [Internal Resources](#)
 - –
 - [External Resources](#)
 - –

Wiki

Portugal

[Dashboard](#) > [Wiki](#) > [Implementation Process](#) > [PT Implementation](#) >  Portugal

-
- Consultation Approach:**
- Public consultation: **TBC**
 - Targeted stakeholder consultation: **TBC**
- Timeline:**
- **TBC**
- Relevant Contacts:**
- Office of Strategy, Planning and Cultural Assessment (GEPAC)
 - General contact address
geral@gepac.gov.pt
- Process:**
- **TBC**
- Additional Remarks:**
- –
- Relevant Resources:**
- Internal Resources
 - –
 - External Resources
 - –

Romania

[Dashboard](#) > [Wiki](#) > [Implementation Process](#) > [RO Implementation](#) >  Romania

-
- Consultation Approach:**
- Public consultation: **NO** (Not currently)
 - Targeted stakeholder consultation: **YES**
- Timeline:**
- General timeline: **TBC**
 - Consultation process:
 - Art. 13, 17 (9) and 21: ORDA sent questionnaire to selected stakeholders (see internal resources below for questionnaire and stakeholder list) – Deadline: 30 Oct, 2019 .
- Relevant Contacts:**
- ORDA – Romanian Copyright Office
 - Mr Doru Adrian Paunescu (Director General)
doru.adrianpaunescu@orda.gov.ro
 - Ms Irina Lucan Arjoca (Adjunct Director General)
irina.lucanarjoca@orda.gov.ro
- Process:**
- Targeted consultation: Currently, targeted consultation limited to specific articles and stakeholders.
 - Art. 13, 17 (9) and 21: Questionnaire was sent to selected stakeholders by ORDA, the Romanian Copyright Office. Deadline: 30 Oct, 2019.
 - ApTI (EDRi member) is drafting a reply.
 - Libraries do not seem to be on the initial list of consulted stakeholders (see list in internal resources).
- Additional Remarks:**
- –
- Relevant Resources:**
- Internal Resources
 - Art. 13, 17 (9) and 21 targeted consultation: [Questions – Stakeholders](#)
 - External Resources
 - –

Wiki

Slovakia

[Dashboard](#) > [Wiki](#) > [Implementation Process](#) > [SK Implementation](#) >  Slovakia

-
- Consultation Approach:**
- Public consultation: **TBC**
 - Targeted stakeholder consultation: **TBC**
- Timeline:**
- General timeline: According to the ministry of culture, the specific transposition plans and a general timetable depend on deadlines still to be set by the government.
- Relevant Contacts:**
- Ministry of Culture (Media, Audiovisual and Copyright Department)
 - Mr Anton Škreko (Managing Director)
anton.skreko@culture.gov.sk
 - General contact address
smaap@culture.gov.sk
- Process:**
- **TBC**
- Additional Remarks:**
- –
- Relevant Resources:**
- Internal Resources
 - –
 - External Resources
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Wiki

Slovenia

[Dashboard](#) > [Wiki](#) > [Implementation Process](#) > [SI Implementation](#) >  Slovenia

- Consultation Approach:**
- Public consultation: **TBC**
 - Targeted stakeholder consultation: **TBC**

- Timeline:**
- **TBC**

- Relevant Contacts:**
- Ministry of Economic Development and Technology (Slovenian Intellectual Property Office [SIPO])
 - Ms Mojca Pečar (Copyright Department)
mojca.pecar@uil-sipo.si
 - Ms Petra Boškin (Copyright Department)
petra.boskin@uil-sipo.si
 - Mr Janez Kukec Mezek (Copyright Department)
janez.kukec@uil-sipo.si

- Process:**
- **TBC**

- Additional Remarks:**
- –

- Relevant Resources:**
- Internal Resources
 - –
 - External Resources
 - –

Wiki

Spain

[Dashboard](#) > [Wiki](#) > [Implementation Process](#) > [ES Implementation](#) >  Spain

-
- Consultation Approach:**
- Public consultation: **Expected**
 - Targeted stakeholder consultation: **TBC**
- Timeline:**
- **TBC**
- Relevant Contacts:**
- Ministry of Culture and Sports – Directorate for Cultural Industries and Cooperation
 - Mr Carlos Guervós Maillo (Director of the Sub-Directorate General for Intellectual Property)
propiedad.intelectual@cultura.gob.es
- Process:**
- General: The Spanish Ministry of Culture and Sport participates in the EC's Copyright Contact Committee discussing the DCDSM transposition.
 - Public consultation: The Ministry expects to soon launch a public consultation on the draft transposition law, which should be accessible through the Ministry's web portal.
- Additional Remarks:**
- –
- Relevant Resources:**
- Internal Resources
 - –
 - External Resources
 - –

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- Consultation Approach:**
- Public consultation: **NO** (Upcoming consultation post-draft legislation)
 - Targeted stakeholder consultation: **YES** (Ongoing pre-draft legislation)
- Timeline:**
- General timeline: Ministry is working on draft legislative proposal and aims to finalise it by Spring/Summer 2020. Next, written stakeholder consultations will be held. The ambition is to finalise the legislative proposal and to send it to Parliament by Spring 2021.
 - Consultation process: Upcoming public consultation in 2020 on draft legislative proposal.
- Relevant Contacts:**
- Ministry of Justice (Division for IP Law & Transport Law)
 - Mr Anders Olin (Director IP Law & Transport Law Division)
anders.olin@gov.se
 - Mr Patrik Sundberg (Legal Advisor)
patrik.sundberg@gov.se
 - General contact address
ju.l3@regeringskansliet.se
- Process:**
- Stakeholder Reference Group:
 - 16 Sept 2019 – Article 17 discussion
- Additional Remarks:**
- Consultation deadlines:
 - Written Comments on Article 17 [Deadline: 25 Oct, 2019]: Swedish Justice Ministry welcomes written input on Article 17 until 25 October, 2019. Feedback to be addressed to: ju.l3@regeringskansliet.se.
 - Consultation process:
 - Public consultation: Upcoming public consultation in 2020 on draft legislative proposal.
 - Targeted stakeholder consultation: Ministry invited around 100 stakeholders (companies, organisations, government agencies) to join their 'stakeholder reference group', which meets to analyse and discuss the various aspects of the DCDSM. These monthly meetings are currently scheduled until March 2020. This group is not closed, and stakeholders can request to join, as the Ministry wants to have all affected stakeholders represented.
 - 'Stakeholder Reference Group': Group is not closed, and stakeholders can request to join
- Relevant Resources:**
- Internal Resources
 - [Unofficial Translation of SE's Art. 17 Memorandum \[Sept, 2019\]](#)
 - External Resources
 - –

-
- Consultation Approach:**
- Public consultation: **TBC**
 - Targeted stakeholder consultation: **TBC**
- Timeline:**
- General timeline: The UK Intellectual Property Office (IPO) is working towards the timeline set out in Theresa May's Withdrawal Agreement, on the assumption that there will be a transition period which concludes at the end of 2020.
 - The copyright Directive must be implemented by 7 June 2021, this falls outside the initial implementation period provided in the Withdrawal Agreement, and would imply that the copyright Directive will not be transposed into UK law. [Obviously, this derives from the assumption that Brexit will happen]
- Relevant Contacts:**
- Intellectual Property Office (IPO).
 - Ms Ros Lynch (Director, Copyright & IP Enforcement)
ros.lynch@ipo.gov.uk
- Process:**
- **TBC**
- Additional Remarks:**
- UK flavoured copyright Directive: On the question if the UK will implement its own version of the Directive, EurActiv was told that: "the Government will consider such policy questions in due course."
- Relevant Resources:**
- Internal Resources
 - –
 - External Resources
 - Government [webpage](#) on changes to Copyright Law after Brexit